

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**TROUT POINT LODGE, LIMITED, A Nova Scotia  
Limited Company; VAUGHN PERRET and  
CHARLES LEARY**

**PLAINTIFFS**

**VERSUS**

**CIVIL ACTION NO: 1:12CV00090 LG-JMR**

**DOUG K. HANDSHOE**

**DEFENDANT**

---

**RESPONSE OF TROUT POINT LODGE, LIMITED, A NOVA SCOTIA  
LIMITED COMPANY, VAUGHN PERRET, AND CHARLES LEARY TO  
MOTION TO REQUIRE COST BOND FOR APPEAL FILED BY PLAINTIFF**

---

COME NOW Plaintiffs/Appellants, Trout Point Lodge, Limited, a Nova Scotia Limited Company, Vaughn Perret, and Charles Leary and file this their response to Defendant/Appellee's Motion to Require Cost Bond for Appeal [Docket No. 39], and in support show that for the reasons set forth in their separately filed brief supporting this response, the relief requested by Defendant/Appellee, Handshoe, should be denied.

Respectfully submitted, this the 22<sup>nd</sup> day of January, 2013.

Trout Point Lodge, Limited, Vaughn Perret and  
Charles Leary, Judgment Creditors

By: s/ Henry Laird  
Henry Laird, Mississippi Bar No. 1774

**CERTIFICATE OF SERVICE**

I, Henry Laird, do hereby certify that I have sent a true and correct copy of the foregoing Response by using the ECF system to the following:

G. Gerald Cruthird, Esquire  
Post Office Box 1050  
Picayune, Mississippi 39466  
Email: [ggeraldc@bellsouth.net](mailto:ggeraldc@bellsouth.net)

Jack E. Truitt, Esquire  
The Truitt Law Firm, LLC  
149 North New Hampshire Street  
Covington, LA 70433  
Email: [mail@truittlaw.com](mailto:mail@truittlaw.com)

This the 22<sup>nd</sup> day of January, 2013.

s/ Henry Laird

Henry Laird (MSB No. 1774)

Email: [hlaird@joneswalker.com](mailto:hlaird@joneswalker.com)

Jaklyn Wrigley (MSB No. 103773)

Email: [jwrigley@joneswalker.com](mailto:jwrigley@joneswalker.com)

JONES WALKER

2510 14th Street, Suite 1125 (39501)

Post Office Drawer 160

Gulfport, MS 39502

Telephone: (228) 864-3094

Facsimile: (228) 864-0516